| May Of | 6 10 09:18a  | The        | Weitzmans             | 801 760 1111               | p. |
|--------|--------------|------------|-----------------------|----------------------------|----|
|        | Case 1:00-cv | /_O11/11_0 | MH-IDD Document 21-21 | Filed 05/06/10 Page 1 of 3 |    |

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## IN THE UNITED STATES DISTRICT COURT FOR THE EASTERN DISTRICT OF VIRGINIA

## Alexandria Division

| Warren Weitzman,     |                | )           |                               |
|----------------------|----------------|-------------|-------------------------------|
| v.                   |                | )<br>)<br>) | Case No. 1:09 CV 1141-CMH/IDD |
| Lead Networks Domain | ns Pvt. Ltd.   | )           |                               |
| In Re:               | profesia.com   | ,           |                               |
| belis.com            | reabok.com     |             |                               |
| daffy.com            | remolacha.com  |             |                               |
| epsun.com            | satz.com       |             |                               |
| fivebars.com         | sonystyles.com |             |                               |
| gunit.com            | sunlet.com     |             |                               |
| helmsley.com         | vespas.com     |             |                               |
| livs.com             | vitallium.com  |             |                               |
| mascaron.com         | viao.com       |             |                               |
| oncologics.com       | zire.com       |             |                               |
| pirreli.com          | redroof.org    |             |                               |

## Affidavit of Warren Weitzman

I Warren Weitzman do hereby state under penalty of law that the follow statements are true and accurate to the best of my knowledge and belief.

1. I am the true owner of the below listed domain names, having acquired each on the date listed below:

| 1 | belis.com    | 7/19/2002 |
|---|--------------|-----------|
| 2 | daffy.com    | 1995      |
| 3 | epsun.com    | 7/16/2001 |
| 4 | fivebars.com | 5/1/2006  |
| 5 | gunit.com    | 4/22/2001 |
| 6 | helmsley.com | 7/10/2003 |
| 7 | livs.com     | 6/14/2001 |
| 8 | mascaron.com | 5/19/2005 |

| 9  | oncologics.com | 6/10/2004  |
|----|----------------|------------|
| 10 | pirreli.com    | 1/10/2003  |
| 11 | profesia.com   | 11/25/2003 |
| 12 | reabok.com     | 3/28/2000  |
| 13 | remolacha.com  | 6/30/1999  |
| 14 | satz.com       | 12/16/2002 |
| 15 | sonystyles.com | 5/1/2005   |
| 16 | sunlet.com     | 11/30/2003 |
| 17 | vespas.com     | 3/29/2002  |
| 18 | vitallium.com  | 5/27/2006  |
| 19 | viao.com       | 9/29/1999  |
| 20 | zire.com       | 10/10/2004 |
| 21 | redroof.org    | 9/29/1999  |

- 2. I have used the above listed domain names since acquisition in my business and have generated significant income from these domains until control was taken by Lead Networks who was at that time the registrar for the subject domains.
- 3. Prior to the domains being misappropriated by Lead Networks, they generated in excess of \$2,000 per month. From records received in this matter, it appears that Lead Networks has, through their inaction, drastically reduced the income generated by these domains.
- 4. The subject domain names are collectively worth more than Two Million Dollars (\$2,000,000).
- 5. Lead Networks, as then-registrar for these domain names, inserted itself a controller of the domains depriving me of income from these domains as well as the ability to sell them.
- 6. Lead Networks did so out of spite as evidenced by their failing to properly monitize the domains to generate the same level of income as I had received when I controlled my domains. What little income was generated went to Lead Networks.

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- 7. I am seeking return of my domain names so that I may return to doing business as I have for many years.
- 8. As to the domain names sonystyles.com and viao.com, I am no longer asserting any ownership in these domains and am dismissing those domains.

Dated: the \_\_\_\_ day of May, 2010.

City/County of Alenton On Engl

· Subscribed and sworn before me by Warren Weitzman in the above named city/county this  $\bigcirc$  day of May, 2010.

> JENNIFER ANNE FITZPATRICK **Notary Public** ontgomery County Maryland My Commission Expires Apr 2, 2014

My Commission Expires: \_\_\_